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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

**HILLARY LAWSON, KRISTINA  
HALLMAN, MOIRA HATHAWAY,  
MACEY SPEIGHT, ROSEMARIE  
PETERSON, and LAUREN FULLER,**

Plaintiffs,

– against –

**HOWARD RUBIN, JENNIFER POWERS,  
and the DOE COMPANY.**

Defendants.

Case No.: 1:17-cv-06404 (BMC)

**REDACTED**

**DECLARATION OF JOHN G.  
BALESTRIERE IN OPPOSITION  
TO DEFENDANTS' MOTIONS  
FOR SUMMARY JUDGMENT**

I, John G. Balestriere, an attorney duly admitted to practice law in the Eastern District of New York, of legal age and under penalty of perjury, declare the following:

1. I am an attorney with the law firm Balestriere Fariello. We represent Plaintiffs Hillary Lawson (“Lawson”), Kristina Hallman (“Hallman”), Moira Hathaway (“Hathaway”), Macey Speight (“Speight”), Rosemarie Peterson (“Peterson”), and Lauren Fuller (“Fuller”) or collectively, (“Plaintiffs”)<sup>1</sup> in the above-referenced action, and I submit this Declaration in

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<sup>1</sup> All terms are as defined in Plaintiffs’ Memorandum of Law in Opposition to Howard Rubin’s Motion for Summary Judgment, filed simultaneously with this declaration.

Opposition to Howard Rubin's Motion for Summary Judgment and Jennifer Powers's Motion for Summary Judgment.

2. Attached to this Declaration as Exhibit A is a true and correct copy of the relevant excerpts of the deposition of Jennifer Powers, dated October 16, 2018.

3. Attached to this Declaration as Exhibit B is a true and correct copy of the relevant excerpts of the Epiq Production commissioned by Defendants.

4. Attached to this Declaration as Exhibit C is a true and correct copy of the relevant excerpts of the deposition of Hillary Lawson, dated September 25, 2018.

5. Attached to this Declaration as Exhibit D is a true and correct copy of the relevant excerpts of the deposition of Lauren Fuller, dated October 18, 2018.

6. Attached to this Declaration as Exhibit E is a true and correct copy of the relevant excerpts of Text Messages Between Howard Rubin and Jennifer Powers.

7. Attached to this Declaration as Exhibit F is a true and correct copy of the relevant excerpts of the deposition of Moira Hathaway, dated September 20, 2018.

8. Attached to this Declaration as Exhibit G is a true and correct copy of the deposition transcript of Rosemarie Peterson, dated September 27, 2018

9. Attached to this Declaration as Exhibit H is a true and correct copy of the relevant excerpts of the deposition of Kristina Hallman, dated September 12, 2018.

10. Attached to this Declaration as Exhibit I is a true and correct copy of the Affidavit of Moira Hathaway, dated March 5, 2019.

11. Attached to this Declaration as Exhibit J is a true and correct copy of the deposition transcript of Macey Speight, dated October 23, 2018.

12. Attached to this Declaration as Exhibit K is a true and correct copy of Expert Report of Park Dietz, dated November 5, 2018.

13. Attached to this Declaration as Exhibit L is a true and correct copy of the relevant excerpts of the deposition of Howard Rubin, dated October 25, 2018.

14. Attached to this Declaration as Exhibit M is a true and correct copy of the deposition transcript of Stephanie Shon, dated October 10, 2018.

15. Attached to this Declaration as Exhibit N is a true and correct copy of photographs produced by Plaintiff Hallman regarding the September 24, 2016, encounter.

16. Attached to this Declaration as Exhibit O is a true and correct copy of photographs of Plaintiff Lawson's breasts following the December 21, 2016, encounter.

17. Attached to this Declaration as Exhibit P is a true and correct copy of photographs of Plaintiff Hathaway's breasts following an encounter with Defendant Rubin.

18. Attached to this Declaration as Exhibit Q is a true and correct copy of photographs of Plaintiff Peterson's eye following an assault by Defendant Rubin.

19. Attached to this Declaration as Exhibit R is a true and correct copy of photographs of Plaintiff Speights buttocks and breasts following an assault by Defendant Rubin.

20. Attached to this Declaration as Exhibit S is a true and correct copy of a medical authorization form for Plaintiff Hathaway.

21. Following the Hallman deposition, I had a discussion with my client and understood that she was not in possession of [REDACTED]. Attached to this Declaration as Exhibit T is a true and correct copy of the email from Kristina Hallman to Jin Lee, dated October 5, 2018.

Dated: New York, New York  
March 6, 2019

By: 

John G. Balestriere

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